

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Melinda Serin, Judson Russ, Long Soui Lim, Peri Kettler, Gordon Redner, and Thomas J. Smith, Plaintiffs, vs. Northern Leasing Systems, Inc., Jay Cohen, Rich Hahn, and Sara Krieger Defendants	Docket No. 06-CV-1625 (JSG) DECLARATION OF STEPHEN GARDNER, ESQ.,
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Stephen Gardner, Esq., declares as follows pursuant to 28 U.S.C. §1746:

1. I am the Director of Litigation for the Washington, DC based advocacy group, Center for Science in the Public Interest. Previously, I was Of Counsel to the National Consumer Law Center (2002-2006); Assistant Dean of Clinical Education at Southern Methodist University School of Law (1994-1995); Visiting Assistant Professor of Law at Southern Methodist University School of Law (1992-1995); Assistant Attorney General, in the Consumer Protection Division of the State of Texas (1984-1991); Assistant Attorney General in the Bureau of Consumer Frauds of the State of New York (1982-1984); Students Attorney at the University of Texas (1981-1982); and a staff attorney at the legal aid office in Austin, now part of Texas RioGrande Legal Services (1976-1981). I am also a frequent author and speaker on consumer advocacy issues.

2. Although my offices are in Dallas, Texas, I handle complex federal litigation all over the country. I am admitted to practice in both the Southern and Eastern Districts of New York, and have a case currently pending in the Eastern District (*Ackerman v. The Coca Cola Company*, No. 1:09-cv-00395-DI-RL). As such, I am familiar with the billing rates and practices of attorneys handling complex federal cases in New York.

3. I am also familiar with the work and reputation of both Seth Lesser and Krishnan Chittur. Both of them have over twenty years of experience handling complex litigation in federal courts. Both are highly skilled, seasoned, and successful attorneys based in New York.

4. Based on my experience and knowledge of attorney billing in New York, I believe that \$625 is at the lower end of the range of prevailing rates for attorneys with comparable standing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 28, 2010 in Dallas, Texas

A handwritten signature in blue ink, appearing to read "Stephen Gardner", written in a cursive style.

Stephen Gardner, Esq.